

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No. 04-10190-DPW
)	
GREG SMITH)	
)	

JOINT MOTION TO EXTEND PRE-TRIAL DEADLINES

The parties request an extension of time--to March 11, 2006--to file a trial brief, proposed voir dire questions, and proposed jury instructions. Pursuant to this Court's Trial Order, the deadline for filing these documents is today, March 7, 2006. The parties make this request because the parties are attempting to resolve this case with an alternate charge, and it is hoped that a plea agreement will be reached before March 11, 2006. At the present time, AUSA Connolly is awaiting approval to file the contemplated substitute charge. For these reasons, the government requests an extension of time within which to file the above documents.

Respectfully submitted,

United States
By:

/s/ William H. Connolly
Assistant U.S. Attorney

Defendant
By his attorney:

/s/ Charles McGinty

DATE: March 7, 2006